

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

CITY OF HOLLYWOOD	)	Civ. No. 0:24-cv-01743-JMB-ECW
FIREFIGHTERS' PENSION FUND,	)	
Individually and on Behalf of All Others	)	<u>CLASS ACTION</u>
Similarly Situated,	)	
	)	MEET-AND-CONFER STATEMENT
Plaintiff,	)	REGARDING CALIFORNIA PUBLIC
	)	EMPLOYEES' RETIREMENT
vs.	)	SYSTEM'S MOTION FOR
	)	APPOINTMENT AS LEAD PLAINTIFF
UNITEDHEALTH GROUP INC., et al.,	)	AND APPROVAL OF LEAD
	)	PLAINTIFF'S SELECTION OF LEAD
Defendants.	)	COUNSEL
	)	

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I, James Poradek, am Of Counsel with Somermeyer Sullivan PLLC, local counsel for proposed lead plaintiff California Public Employees' Retirement System ("CalPERS") in the above-captioned action. Based on the procedures set out in the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4(a)(3)(B)(i), any "purported class member . . . including any motion by a class member who is not individually named as a plaintiff in the complaint" may file a motion seeking appointment as lead plaintiff by July 15, 2024. Because the identities of potential movants are currently unknown, CalPERS' counsel cannot meet and confer with the unidentified parties regarding CalPERS' motion for appointment as lead plaintiff before filing its motion. As a result, CalPERS' counsel respectfully requests that compliance with LR 7.1(a)'s conferral requirement be waived in this narrow instance. After all the parties moving for appointment as lead plaintiff are known, CalPERS' counsel will meet and confer with them and supplement this meet-and-confer statement.

DATED: July 15, 2024

Respectfully submitted,

SOMERMEYER SULLIVAN PLLC  
TIM SULLIVAN, MN 391528  
JAMES PORADEK, MN 290488 (OF COUNSEL)

s/ James Poradek  
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